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8 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

) CASE NO. CR 11-0811 EMC

14 Plaintiff,

)) STIPULATION CONTINUING HEARING ON
15 v.) POST-TRIAL MOTIONS TO SEPTEMBER 18,
HASAN IBRAHIM,) 2013; [PROPOSED] ORDER (modified)

16)
17)
18)
19)
Defendant.

21 **STIPULATION**

22 The United States and defendants MedChem Corporation and Hasan Ibrahim stipulate as
23 follows:

- 24 1. Defendant filed three post-trial motions – a Rule 29 motion for acquittal (Docket No. 158), a Rule 33
25 motion for a new trial (Docket No. 160), and a motion to dismiss counts 2-9 (Docket No. 161).
26 2. Currently, the motions are set for hearing on August 21, 2013, and the government response to the
27 Rule 29 motion is due on August 7, 2013.
28

- 1 3. At the government's request, the parties agreed to continue the briefing and hearing schedule as
2 follows: the government's oppositions to the Rule 29 motion, the Rule 33 motion, and the motion to
3 dismiss are due on August 26; any replies by the defendant are due on September 4, and the hearing
4 will occur on September 18, 2013, at 2:30 pm.
- 5 4. The government made this request because: the defense has filed three motions and government
6 counsel needs additional time to examine the factual and legal issues raised by defendant's motions;
7 both government counsel have been unavailable at various times; and government counsel had to
8 prepare for a motions and trial setting hearing in another matter that was rescheduled to August 8,
9 2013.

10 SO STIPULATED.

11 DATED: August 7, 2013

MELINDA HAAG
United States Attorney

/S/

PETER B. AXELROD
BRIAN STRETCH
Assistant United States Attorneys

18 DATED: August 7, 2013

/S/

JAMES McNAIR THOMPSON
Attorney for Defendant Hasan Ibrahim

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28 STIPULATION AND ORDER RE: POST-TRIAL MOTIONS
CR 11-0811 EMC

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing, the Court continues the motions' hearing currently set for August 21, 2013 to September 18, 2013 at 2:30 p.m. The Court also sets the following the government's oppositions to the Rule 29 motion, the Rule 33 motion, and the motion to dismiss
14 August 21
(Docket Nos. 158, 160, 161) are due on August 26; any replies by the defendant are due on September 4.

IT IS SO ORDERED.

DATED: 8/7/13

